

Exhibit 1

Joy Odom

From: deBettencourt, Justin D. <JdeBettencourt@ReedSmith.com>
Sent: Tuesday, November 22, 2016 6:24 PM
To: Ariel Trajtenberg; 'Simon Sandoval-Moshenberg'; Wookie Kim; Joy Odom
Cc: Dingman, Michael S.
Subject: RE: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.)

Hi Ariel:

Thanks for your email. We do not agree that a motion for summary judgment is premature and will be setting Defendants' Motion for Summary Judgment for hearing on December 16. Defendants also do not agree to an extension of time for Plaintiffs' opposition.

Thanks,
Justin

From: Ariel Trajtenberg [mailto:arieltrajtenberg@quinnemanuel.com]
Sent: Tuesday, November 22, 2016 5:58 PM
To: deBettencourt, Justin D.; 'Simon Sandoval-Moshenberg'; Wookie Kim; Joy Odom
Cc: Dingman, Michael S.
Subject: RE: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.)

Justin,

Plaintiffs do not agree to withdraw any counts of their complaint.

Though we are available for a hearing on December 16, a motion for summary judgment at this time is premature in light of the outstanding expert and fact discovery. Depositions of Defendants will not be complete until December 6 (assuming that Mr. Williams' deposition moves forward on December 5). Defendants' expert reports are not due until November 28, Plaintiffs' rebuttal reports are not due until December 9, and expert depositions remain outstanding. Accordingly, should Defendants elect to file their motion for summary judgment this week, please let us know if Defendants will agree to stipulate to an extension of time for Plaintiffs' opposition until after fact and expert discovery are complete.

Best,
Ariel

Ariel Wade Trajtenberg
Associate,
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From: deBettencourt, Justin D. [mailto:JdeBettencourt@ReedSmith.com]
Sent: Tuesday, November 22, 2016 12:01 PM
To: Ariel Trajtenberg <arieltrajtenberg@quinnemanuel.com>; 'Simon Sandoval-Moshenberg' <simon@justice4all.org>; Wookie Kim <wookiekim@quinnemanuel.com>; Joy Odom <joyodom@quinnemanuel.com>
Cc: Dingman, Michael S. <MDingman@ReedSmith.com>
Subject: Giron De Reyes, et al. v. Waples Mobile Home Park LP, et al., No. 1:16-cv-563 (E.D. Va.)

Hi Ariel:

We intend to file a Motion for Summary Judgment on all counts of Plaintiffs' Complaint. Please let us know if you agree to withdraw any counts of Plaintiffs' Complaint.

We intend to set the hearing on the Motion for Summary Judgment for December 16. Please let us know if that hearing date works for Plaintiffs.

Thanks,
Justin

Justin deBettencourt

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